



June 27, 2022

BY ECF AND EMAIL

The Honorable Analisa Torres
 United States District Judge
 U.S. District Court for the Southern District of New York
 500 Pearl Street, Courtroom 15D
 New York, New York 10007-1312

**Re: Nosirrah Management, LLC v. EVmo Inc. et al., No. 21-cv-10529
 Letter Motion for Extension of Deadline to Submit Joint Letter and
 Jointly Proposed Case Management Plan and Scheduling Order**

Dear Judge Torres:

We represent Plaintiff Nosirrah Management, LLC in the above-referenced matter. Pursuant to the Court's Individual Practices I.C and II.B, we write to respectfully request that the Court adjourn the June 27, 2022 deadline for the parties to submit a joint letter and proposed Case Management Plan and Scheduling Order until after the resolution of Defendants' motion to transfer venue.

Plaintiff had requested the deadline of June 27, 2022 in a letter filed on April 15, 2022 to which Defendants consented. Dkt. No. 20. Plaintiff was unaware, however, that Defendants intended to file a motion to transfer venue of this action to the United States District Court for the Central District of California (the "Motion to Transfer") as Defendants' letter requesting leave to file the Motion to Transfer was not filed until April 25, 2022. Dkt. No. 25. The Court granted Defendants' request on May 4, 2022. Dkt. No. 27. Defendants' Motion to Transfer was filed on June 8, 2022. Dkt. No. 28. Pursuant to the briefing schedule set by the Court, Plaintiff's opposition to Defendants' is due on June 29, 2022; Defendants' reply, if any, is due on July 13, 2022.

As Plaintiff will set forth in its opposition, Plaintiff does not believe that transfer of this action is warranted. However, if the Court grants the Motion to Transfer, this Court need not enter a Case Management Plan and Scheduling Order. Postponement of the deadline for the parties' submission of a joint letter and proposal thus conserves judicial resources. Additionally, if the Court were to enter a Case Management Plan and Scheduling Order, and then grant the Motion to Transfer, the parties will likely have to submit a different Case Management Plan and Scheduling Order to comply with the local rules of the United States District Court for the Central District of California and the individual practices of a new judge. Adjourning the June 27, 2022 deadline thus avoids unnecessary duplication of efforts.

GRANTED. The parties shall submit their joint letter and proposed case management plan within one week of the Court's decision on the pending motion to transfer.

SO ORDERED.

Dated: June 28, 2022
 New York, New York

ANALISA TORRES
 United States District Judge